# REMARKS

#### **Status of Claims**

Claims 1-10 and 12-20 are pending in this application. By this Amendment, claims 1-6, 9, 12, 13, 18, and 20 have been amended and claim 11 has been canceled. The Amendments to the claims are fully supported by the specification and do not introduce new matter. Reconsideration of the rejections of all claims is earnestly solicited in view of the above amendments and the following remarks.

# Rejection of Claims under 35 U.S.C. § 102(e)

Claims 1-4, 6, 7, 9, and 11-20 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent 5,946,499 to Saunders. This rejection is respectfully traversed.

Independent claim 1 defines a computerized system providing a multi-modal text editing correction environment. The system includes an application program owning a document and a plurality of input device handlers capable of entering text into the document and performing text correction. The system also includes a common text framework. The common text framework includes a mechanism to track initial entry of each specified portion of text into the document by each handler, such that each handler is associated with the specified portion of text it enters into the document. The common text framework also includes a correction interface callable by the application program to correct the specified text portion after initial entry of the specified text portion into the document and to determine a responsible handler, based on tracking mechanism data, that initially entered the specified text portion into the document. The correction interface calls the responsible handler for correction.

Saunders lacks several features of independent claim 1. First, Saunders fails to disclose a mechanism to track initial entry of each specified portion of text into the document by each handler. Additionally, Saunders fails to disclose a correction interface that determines and calls upon the handler initially responsible for entering text as determined by the tracking mechanism to assist in the correction process.

Saunders discloses a method for providing a text input system for multiple modes of input. As shown in FIG. 4B, the system determines a type of input event and assigns

an appropriate handler based on the type of input event. In a preferred embodiment, as set forth in Column 5, lines 42-49, the system of Saunders sends interactive events, such as correction events, outside of the system to another text service. The method of Saunders is intended to be entirely transparent to the application.

However, Saunders does offer a protocol to allow communication between a text service and an application as shown in FIG. 5 and described in Column 6, line 16 – Column 7, line 17 of Saunders. While this process includes a "reservation" mechanism, it does not include a tracking mechanism as set forth in claim 1. If a text service receives content from an application, the text services manager will provide a reservation identifier for that particular content to ensure that there are no conflicts. For example, a non-zero value indicates access is not available, while a zero value indicates available access. If access is available, the text service makes corrections and removes the reservation. See Column 7, lines 13-17 of Saunders. Accordingly, the system of Saunders does not keep track of which text service operated on a specified portion of text. Furthermore Saunders does not keep track of whether a text service initially acted or has already acted on the text. The system of Saunders only knows whether the text is currently in use. In other words, the text is available or unavailable. It does not know which text service initially acted upon or entered the text.

Accordingly, because Saunders lacks at least (1) the tracking mechanism to track initial entry of each specified portion of text into the document by each handler and (2) the correction interface that determines and calls upon the handler initially responsible for entering text as determined by the tracking mechanism, Saunders fails to anticipate the invention of claim 1. Claims 2-4 depend from claim 1 and define over Saunders for at least the reasons set forth above with respect to claim 1.

Independent claim 6 defines a machine readable medium having instructions including a mechanism to track initial entry of text into a document owned by an application program by each of a plurality of input device handlers, such that each input device handler is associated with text it enters into the document. The instructions further include a correction interface callable by the application program after initial text entry to determine a responsible input device handler responsible for initially entering

specified text into the document and for calling upon the responsible input device handler to assist in correction of the specified text.

Saunders lacks several features of independent claim 6. First, Saunders fails to disclose a mechanism to track initial entry of each specified portion of text into the document by each handler. Additionally, Saunders fails to disclose a correction interface that determines and calls upon the handler initially responsible for entering text as determined by the tracking mechanism to assist in the correction process.

Accordingly because Saunders lacks each feature of claim 6, Saunders fails to anticipate claim 6. Claim 7 depends from claim 6 and is allowable over Saunders for at least the reasons set forth above with respect to claim 6.

Independent claim 9 defines a computer-implemented method. The method includes entering text into a document owned by an application by a handler for an input device via a common text framework governing interaction between the application and the handler for the input device, such that the application exposes the document as an abstraction. The method of claim 9 additionally includes tracking of the initial entry of text entered into the document by the handler by the common text framework and requesting of the common text framework by the application of an identity of a particular handler that was responsible for initially entering specified text into the document. The method further includes returning to the application the identity of the particular handler that was responsible for initially entering the specified text into the document and requesting of correction information from the particular handler.

As set forth above, Saunders fails to disclose the step of tracking the initial entry of text into a document by a handler. Saunders further fails to disclose ascertaining the identity of the particular handler that was responsible for the initial entry. Finally, Saunders also fails to disclose requesting correction information from the particular handler responsible for the initial entry of text.

Because Saunders fails to disclose each and every feature of independent claim 9, Saunders fails to anticipate independent claim 9. Claims 12-19 depend from claim 9 and are allowable over Saunders for at least the reasons set forth above.

Independent claim 20 defines a computer-implemented method including entering text into a document owned by an application by a handler for an input device, via a common text framework governing interaction between the application and the handler for the input device, such that the application exposes the document as an abstraction. The method of claim 20 additionally includes tracking of the text entered during initial text processing into the document by the handler for the input device by the common text framework and requesting an identity of a particular handler responsible for entering specified text during initial text processing. Claim 20 also includes returning the identity of the particular handler that was responsible for entering the specified text into the document during initial text processing and after initial text processing and requesting that the particular handler assist with correction.

Saunders fail to disclose several features of independent claim 20. As set forth above, Saunders fails to disclose at least the features of tracking text during initial text processing and requesting an identity of the particular handler entering the text. Saunders also fails to disclose returning the identity of the handler that was responsible for entering the specified text and requesting that the particular handler assist with correction. Because Saunders fails to disclose at least the above-identified features of claim 20, Saunders fail to anticipate claim 20.

Claim 11 has been canceled and Saunders fails to show each and every feature of claims 1-4, 6, 7, 9, and 12-20 as set forth above. Accordingly, withdrawal of the rejection of claims 1-4, 6, 7, 9, and 11-20 under 35 U.S.C. §102 is respectfully requested.

#### Rejection of Claims under 35 U.S.C. § 103(a)

Claims 5, 8, and 10 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Saunders in view of Covington *et al.*, U.S. Patent No. 5,524,193 (hereinafter "Covington").

Claims 5 and 8 depend from claim 6 and claim 10 depends from claim 9. These dependent claims are allowable over Saunders for at least the reasons set forth above with respect to the independent base claims. Covington fails to obviate the deficiencies of Saunders noted above. Accordingly, applicants respectfully submit that claims 5, 8, and

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10 are allowable over the art of record and withdrawal of the rejection under 35 U.S.C. §103 is respectfully requested.

### **CONCLUSION**

Claims 1-10 and 12-20 are pending in this application. In view of the amendments and remarks, applicants respectfully request that this application be allowed and passed to issue. Should any issues remain prior to issuance of this application, the Examiner is urged to contact the undersigned prior to resolve the same. The Commissioner is hereby authorized to charge any additional amount required, or credit any overpayment, to Deposit Account No. 19-2112 referencing Attorney Docket No. MFCP.87509.

Respectfully submitted,

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